

## REMARKS

The Examiner rejected Claims 1-25 as being unpatentable under 35 USC 103(a) over US Patent 4,555,193 to Stone ("Stone").

Applicants believe that this rejection is inappropriate and respectfully ask reconsideration in view of the following remarks. Specifically, Applicants believe that there are crucial differences between their invention and that of Stone, in terms of both methodology and apparatus, and that in view of these differences, a rejection of Applicants' claims is inappropriate.

### Differences in Methodologies

Although Applicants' application and Stone both describe methods of using a keyboard apparatus in which two keys are used to select a particular character, the methodology of Stone is directed to the concurrent actuation of two keys, whereas Applicants' methodology is directed to the sequential selection of two keys.

As summarized by Stone in column 2, lines 27-31:

To select a specific character, the key upon which the character is printed ***must be actuated concurrently*** with the key from within the same field that has a background color identical to the color of the character (sic).  
(emphasis added)

As explained by Stone in more detail in column 4, lines 53-61:

To obtain one of the other characters printed on a key, the user will look to the field of keys to which this key belongs to find the key having a background color identical to the color of the desired character. The field to which a key belongs is determined by position, orientation or some other visually obvious criterion. The other key is ***actuated concurrently*** with the key upon which the desired character is printed to select the desired character. (emphasis added)

Indeed, the words “concurrent” and “concurrently” appear more than 20 times in Stone.

On the other hand, Applicants’ methodology is concerned with the sequential selection of two keys to define a particular character. This point is discussed in some detail in the specification, e.g., page 8, line 3 through page 9, line 11, as well as pp. 13-14. The Examiner is encouraged to review these portions of the specification.

Note that in Stone the concurrent actuation of two keys requires that two fingers be used, whereas Applicants’ methodology is directed to the sequential selection of two keys, so that one finger is sufficient. Thus, Applicants’ invention offers greater ease of use.

With respect to Applicants’ claim language, note that Claim 1 recites “selecting a first character....by ***first*** selecting the first key and ***then*** selecting a key displaying the first marking...” (see page 19, lines 12-14, emphasis added); similar language is used in Claim 1 with respect to selecting a second character. Likewise, similar language is also used in Claims 2, 4, 23, and 25. Furthermore, Claims 23 and 25 specifically use the words “sequences” and “sequence”, respectively.

### Differences in Apparatuses

The keyboard layout of Stone is substantially different from than that of Applicants'. The keyboard of Stone is divided into different fields, with numbers appearing in a first field and letters appearing in second and third fields (see Figure 2 of Stone). This is a radically different layout than the layouts disclosed by Applicants, in which letters and numerals appear on the same keys.

Also, in Stone the number of symbols appearing on any given key depends on the position of that key in its respective field; in Stone, keys further to the left have more symbols, whereas keys further to the right necessarily have fewer symbols. This is clear from a careful reading of Stone, e.g., Figures 1-2 and column 4, line 64 through column 5, line 2:

...in the horizontal fields 12, 14, 16 the leftmost character on the key is selected by actuating the single key independently of any other. The second character is selected by concurrent actuation with the neighboring key to the right. The third character is selected by concurrent actuation with the key two positions to the right and so on.

(For the same reason, the keyboard of Stone requires a greater number of colors to be used.

Note that in Stone's preferred embodiment "five background colors are used in the keyboard..."; see column 3, lines 28-29.)

Because the keyboards of Applicants' invention typically have 3 letters per key, the methodology of Stone would not work with any of Applicants' keyboards. Note that Applicants' keyboards are consistent with standard telephone and cellphone keyboards, as opposed to the keyboard of Stone. Accordingly, standard telephone and cellphone

keyboards may be used with Applicants' methodology, whereas the methodology of Stone can not be applied to these standard keyboards.

Furthermore, in Stone, concurrent actuation of keys requires that the key providing disambiguation be to the right of the key displaying the desired alphanumeric. In Applicants' invention, disambiguation is provided by a subsequently selected key that may, for example, lie to the left or to the right of the first selected key, or the first selected key itself may provide any needed disambiguation.

#### Claim amendments

Minor changes in wording have been made to some of the claims to improve their readability. These amendments are not being offered in response to the Examiner's rejections. Claims 26 and 27 have been added to more fully claim the subject matter that Applicants believe is their invention.

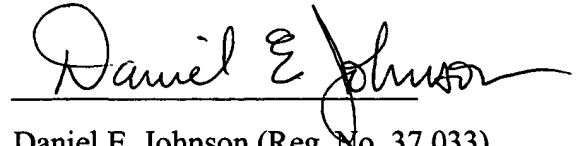
#### Summary

There are significant differences between Applicants' invention and that of Stone, as discussed above. Applicants believe that their claim language adequately distinguishes the prior art, including Stone.

If the Examiner disagrees, he is encouraged to call the undersigned to propose alternative claim language or to otherwise expedite the prosecution of this application.

Respectfully submitted,

Eser Kandogan et al.

A handwritten signature in black ink, reading "Daniel E. Johnson". The signature is written in a cursive style with a large initial "D" and a long horizontal stroke at the end.

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